



11 SUNRISE PLAZA, STE. 305
VALLEY STREAM, NY 11580
(516) 233-1660
WWW.LIEBOWITZLAWFIRM.COM

October 21, 2021

VIA ECF

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Rm 618
New York, NY 10007

MEMO ENDORSED

Re: Caraveo v. General Motors LLC, 1:21-cv-01009 (KPF)

Dear Judge Failla:

We represent plaintiffs Tato Caraveo and Brian Boner (“Plaintiffs”) in the above-captioned case and write pursuant to Section 2.E. of Your Honor’s Individual Practices to respectfully request an additional 45-day extension of time to file a Stipulation of Dismissal (or otherwise move to re-open the case).

- (1) the current deadline for the parties to file a Stipulation of Dismissal is October 25, 2021 [Dkt. No. 57];
- (2) there was one previous request for a 30-day extension [Dkt. No. 56];
- (3) the previous request for an extension of time was granted [Dkt. No. 57];
- (4) the parties respectfully request an additional 45-day extension in order to consummate their settlement. Despite best efforts, the parties have yet to execute a final version of the agreement. However, the parties reasonably anticipate that the transaction will be consummated within the additional requested 45-day period;
- (5) Counsel for Defendant General Motors LLC consents to the requested relief.

Respectfully Submitted,

s/jamesfreeman/
James H. Freeman

Counsel for Plaintiffs

Application GRANTED. It is hereby ORDERED that the period of conditional discontinuance is extended through December 9, 2021. The Clerk of Court is directed to terminate the pending motion at docket number 58.

Dated: October 21, 2021 SO ORDERED.
New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE